

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

GLENCLOVA INVESTMENT CO., a Cayman Islands  
corporation,

Plaintiff,

- against -

TRI, INC., a Delaware corporation, and TPR INVESTMENT  
ASSOCIATES, INC., a Delaware corporation,

Defendants.

Case No. 08-CV7140 (JFK)

TPR INVESTMENT ASSOCIATES, INC.,

Third-Party Plaintiff,

- against -

ARIE GINGER,

Intervenor Defendant, Third Party  
Defendant and Counterclaim

Plaintiff

ARIE GINGER,

Counterclaim Plaintiff

- against -

GLENCLOVA INVESTMENT CO., and TPR  
INVESTMENT ASSOCIATES, INC.,

Counterclaim Defendants

- and -

SAGI GINGER, DALIA GINGER, THE SAGI GINGER  
1993 TRUST, ROCHELLE FANG, Individually and as  
Trustee of the SAGI GINGER 1993 TRUST, TR  
INVESTORS, LLC, NEW TR EQUITY I, LLC, NEW TR  
EQUITY II, LLC, JULES TRUMP, EDDIE TRUMP and  
MARK HIRSCH,

Third Party Defendants

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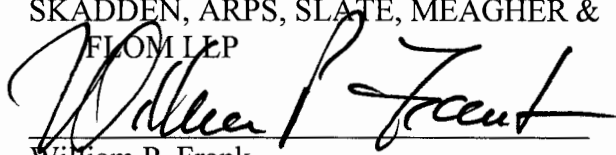
**NOTICE OF MOTION FOR ADMISSION  
PRO HAC VICE OF THOMAS J. ALLINGHAM II**

PLEASE TAKE NOTICE that, upon the declarations of William P. Frank and Thomas J. Allingham II and all prior pleadings and proceedings in this case, William P. Frank, a member in good standing of the bar of this Court, hereby respectfully moves this Court for an order pursuant to Rule 1.3(c) of the Rules of the United States District Court for the Southern District of New York, admitting Thomas J. Allingham II to the bar of this Court *pro hac vice*. For the Court's convenience, a form of Order is annexed hereto.

Dated: October 27, 2011

Respectfully Submitted,

SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM LLP

A handwritten signature in black ink, appearing to read 'William P. Frank', is written over a horizontal line.

William P. Frank  
Four Times Square  
New York, New York 10036  
(212) 735-3000  
[William.Frank@skadden.com](mailto:William.Frank@skadden.com)

*Attorneys for Glenclova Investment Co., TR  
Investors, LLC, New TR Equity I, LLC, New TR  
Equity II, LLC, Jules Trump, Eddie Trump and  
Mark Hirsch*

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SAGI GINGER 1993 TRUST, TR INVESTORS, LLC, NEW TR  
EQUITY I, LLC, NEW TR EQUITY II, LLC, JULES TRUMP,  
EDDIE TRUMP and MARK HIRSCH,

Third Party Defendants

**DECLARATION OF WILLIAM P. FRANK  
IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE**

William P. Frank declares as follows:

1. I am a member of the bar of this Court and of the law firm Skadden, Arps, Slate, Meagher & Flom LLP, attorneys for plaintiff/crossclaim defendant Glenclova Investment Co. and third party defendants TR Investors, LLC, New TR Equity I, LLC, New TR Equity II, LLC, Jules Trump, Eddie Trump and Mark Hirsch. I submit this declaration in support of the motion, pursuant to Rule 1.3(c) of the Rules of the United States District Court for the Southern District of New York (the "Local Rules"), for admission *pro hac vice* of Thomas J. Allingham II to the bar of this Court.

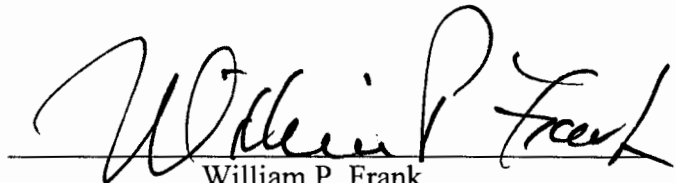
2. Mr. Allingham is member in the Wilmington, Delaware office of the firm of Skadden, Arps, Slate, Meagher & Flom LLP, with offices at One Rodney Square, P.O. Box 636, Wilmington, Delaware 19899 and is a member in good standing of the Bar of the State of Delaware. He also is admitted to practice before the United States District Court for the District of Delaware, the United States Court of Appeals for the Second Circuit, the United States Court of Appeals for the Third Circuit, and United States Supreme Court. Mr. Allingham is also a member of the bar for the State of New Jersey (inactive).

3. Mr. Allingham is familiar with the Federal Rules of Civil Procedure and the Local Rules.

4. Accordingly, I respectfully request that Mr. Allingham be admitted *pro hac vice* to the bar of this Court.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: October 27, 2011



William P. Frank

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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Counterclaim Defendants

- and -

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SAGI GINGER 1993 TRUST, TR INVESTORS, LLC, NEW TR  
EQUITY I, LLC, NEW TR EQUITY II, LLC, JULES TRUMP,  
EDDIE TRUMP and MARK HIRSCH,

Third Party Defendants

**DECLARATION OF THOMAS J. ALLINGHAM II  
IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE**

THOMAS J. ALLINGHAM II declares as follows:

1. I am a member of the law firm of Skadden, Arps, Slate, Meagher & Flom LLP, and maintain my office at One Rodney Square, P.O. Box 636, Wilmington, Delaware 19899-0636. My telephone number is (302) 651-3070 and my email address is thomas.allingham@skadden.com. I submit this declaration in support of the motion, pursuant to Rule 1.3(c) of the Rules of the United States District Court for the Southern District of New York (the "Local Rules"), for my admission *pro hac vice* to the bar of this Court.

2. I am a member in good standing of the Bar of the State of Delaware, having been admitted to that bar in 1978. I attach, as Exhibit A, a Certificate of Good Standing, dated October 11, 2011, issued by the Clerk of the Delaware Supreme Court. I am also a member of the bar for the State of New Jersey (inactive), and also admitted to practice before the United States District Court for the District of Delaware, the United States Court of Appeals for the Second Circuit, the United States Court of Appeals for the Third Circuit, and United States Supreme Court.

3. I have not been subjected to disciplinary action of any sort, including censure, suspension, contempt, or disbarment in any state, nor do I have any grievance pending against me.

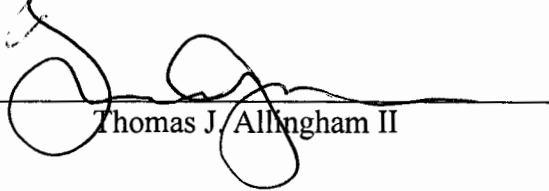
4. I am familiar with the Federal Rules of Civil Procedure and the Local Rules. I agree to be bound by the rules governing the Courts in the State of New York and the Southern District of New York.

5. I respectfully request admission *pro hac vice* to this Court on behalf of plaintiff/counterclaim defendant Glenclova Investment Co. and third party defendants TR

Investors, LLC, New TR Equity I, LLC, New TR Equity II, LLC, Jules Trump, Eddie Trump and Mark Hirsch

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: October 27, 2011



Thomas J. Allingham II



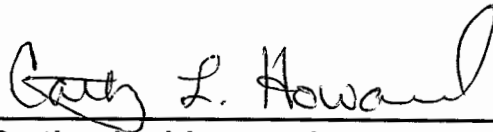
# SUPREME COURT OF THE STATE OF DELAWARE

## CERTIFICATE OF GOOD STANDING

The Clerk of the Supreme Court of the State of Delaware, the highest Court in the State, certifies that **Thomas J. Allingham, II** was admitted to practice as an attorney in the Courts of this State on **February 9, 1978** is an ***active*** member of the Bar of the Supreme Court of the State of Delaware in good standing.

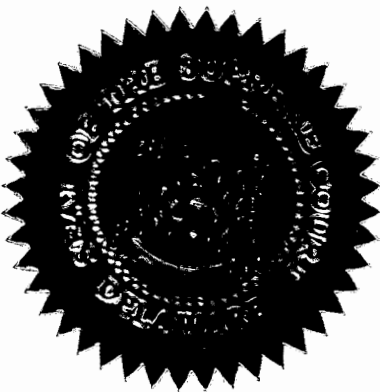
### IN TESTIMONY WHEREOF,

I have hereunto set my hand and  
affixed the seal of said Court at Dover  
this 11th day of October 2011.



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Cathy L. Howard  
Clerk of the Supreme Court



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SOUTHERN DISTRICT OF NEW YORK**

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EQUITY I, LLC, NEW TR EQUITY II, LLC, JULES TRUMP,  
EDDIE TRUMP and MARK HIRSCH,

Third Party Defendants

Upon the motion of William P. Frank, attorney for plaintiff/counterclaim  
defendant Glenclova Investment Co. and third party defendants TR Investors, LLC, New TR

Equity I, LLC, New TR Equity II, LLC, Jules Trump, Eddie Trump and Mark Hirsch, and the above sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Thomas J. Allingham II  
Skadden, Arps, Slate Meagher & Flom LLP  
One Rodney Square  
P. O. Box 636  
Wilmington, Delaware 19899-0636  
Telephone: (302) 651-3071  
Fax: (302) 651-3000  
Email: thomas.allingham@skadden.com

is admitted to practice *pro hac vice* as counsel for plaintiff/counterclaim defendant Glenclova Investment Co. and third party defendants TR Investors, LLC, New TR Equity I, LLC, New TR Equity II, LLC, Jules Trump, Eddie Trump and Mark Hirsch in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: \_\_\_\_\_, 2011  
New York, New York

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United States District Judge

CERTIFICATE OF SERVICE

The undersigned, an attorney duly admitted to practice law before this Court, hereby certifies under penalty of perjury, that on October 31, 2011, I caused a true copy of the **Notice of Motion for Admission *Pro Hac Vice* of Thomas J. Allingham II with the annexed Declaration of William P. Frank in Support of Motion for Admission *Pro Hac Vice* dated October 27, 2011, Declaration of Thomas J. Allingham II in Support of Motion for Admission *Pro Hac Vice* dated October 27, 2011 and [Proposed] Order** to be served upon the following parties by first-class mail, postage prepaid:

Evangelos Michailidis  
Snow Becker Krauss P.C.  
605 Third Avenue  
New York, NY 10158

John Dellaportas  
Duane Morris, LLP (NYC)  
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New York, NY 10036-4086

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Alan Edward Sash  
McLaughlin and Stern, LLP  
260 Madison Ave  
New York, NY 10016

Robert Allen Meister  
Pedowitz & Meister LLP  
1501 Broadway  
New York, NY 10036

Dated: New York, New York  
October 31, 2011



Steven Ray Katzenstein